

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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IN RE: NEW ENGLAND COMPOUNDING) MDL No. 2419
PHARMACY, INC. PRODUCTS LIABILITY)
LITIGATION) Master Dkt. No. 1:13-md-2419- RWZ
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This Document Relates To:)
All Cases)
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**JOINT MOTION FOR EXTENSION OF TIME FOR
DEFENDANT UNIFIRST CORPORATION TO RESPOND TO
PLAINTIFFS' STEERING COMMITTEE'S MOTION TO AMEND
PREVIOUSLY FILED SHORT FORM COMPLAINTS**

Defendant UniFirst Corporation (“UniFirst”) and the Plaintiffs’ Steering Committee (“PSC”) hereby jointly move for an extension of time until September 4, 2014, for UniFirst to respond to the PSC’s Motion to Amend Previously Filed Short Form Complaints (“the Motion to Amend”) (Dkt. No. 1291).

In support of this motion, UniFirst and the PSC state as follows:

1. The PSC filed its Motion to Amend on July 24, 2014, asking the Court to deem amended previously filed Short Form Complaints to add claims that were not yet ripe when plaintiffs first filed the Short Form Complaints.
2. Although the majority of claims to be added are Chapter 93A claims, the PSC may also seek leave to add other “ripened” claims referenced in, but not asserted by, a Short Form Complaint.

3. UniFirst and the PSC request this extension so that the PSC can inventory all Short Form Complaints and identify (1) the specific cases to which the amendments will apply, and (2) the nature of the additional claims to be asserted in each case.

4. UniFirst and the PSC believe that such an inventory and identification of additional potential claims will narrow or resolve UniFirst's opposition to the PSC's Motion to Amend.

WHEREFORE, UniFirst and the PSC respectfully request that the Court grant this joint motion and enter an order extending UniFirst's time to respond to the PSC's Motion to Amend to September 4, 2014.

Dated: August 7, 2014

Respectfully submitted,

DEFENDANT UNIFIRST CORPORATION

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AND

THE PLAINTIFFS' STEERING COMMITTEE

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Plaintiffs' Steering Committee

**LOCAL RULE 7.1(A)(2) CERTIFICATION
AND CERTIFICATE OF SERVICE**

I, James C. Rehnquist, hereby certify that counsel for Defendant, UniFirst Corporation, conferred by e-mail with opposing counsel in an effort to resolve or narrow the issues presented in this motion prior to filing. Plaintiffs join in the relief sought herein.

I further certify that a copy of this document, filed through the CM/ECF system will be accessible to those attorneys who are registered with the Court's electronic filing system and Notice of Electronic filing (NEF) will be sent to these parties by operation of the CM/ECF system on August 7, 2014.

/s/ James C. Rehnquist